



ADAM LAYTON, MCIP, RPP
alayton@goldberggroup.ca
(416) 322-6364 EXT. 2101

June 19, 2025

The Corporation of the City of Richmond Hill
Planning and Infrastructure Department
225 East Beaver Creek Road
Richmond Hill, Ontario
L4B 3P4

Attn: Mr. Salvatore Aiello, Manager, Development Zoning

Dear Mr. Aiello:

**Re: Response to Draft Comprehensive Zoning By-law 30-25 Amendment
Report SRPBS.25.090 (City File: MZBA-23-0001)
363 Jefferson Sideroad, 48 and 60 Beech Avenue
Country Wide Homes (Jefferson) Inc.**

Goldberg Group acts on behalf of Country Wide Homes (Jefferson) Inc., the Owner of the property legally described as 'Lots 58 and 59, and Part of Lot 57, Plan 1916', and municipally known as 363 Jefferson Sideroad, and 48 and 60 Beech Avenue (the 'subject property'). The subject property is an assembly of three lots of record located at the southwest corner of Beech Avenue and Jefferson Sideroad.

We have previously submitted applications to amend the City of Richmond Hill Zoning By-law, and for approval of applications for Draft Plan of Subdivision, Site Plan Control, Draft Plan of Condominium (common element) in order to permit the redevelopment of the property with a 46 townhouse dwelling units accessed by a private condominium laneway (City Files: D02-14036, D03-14015, D05-20005, and D06-20026).

The Draft Plan of Subdivision was approved on July 6, 2022, and registered as Plan 65M-4850 on May 21, 2025. The implementing Zoning By-law Amendment was passed by City Council on June 28, 2023 as By-law 71-23. The Site Plan Control Agreement is pending finalization and execution.

At present, the only remaining Planning Act processes necessary to implement the proposed development are to achieve approval of the pending draft plan of condominium application and to seek an exemption from the provisions of Part Lot Control. It is understood that a Recommendation Report related to the plan of condominium is scheduled to be heard in September 2025. The application for Part Lot Control exemption is to be provided once foundations have been constructed, as is standard practice.

On behalf of our Client, we have previously provided comments with respect to the 'Centres and Corridors' portions of the Comprehensive Zoning By-law 30-25 (the "CZBL") prior to adoption by Council on March 12 and March 13, 2025.

Additionally, our Client is an Appellant of the CZBL. Therefore without prejudice to the ongoing appeal, we provide the following comments on behalf of our Client.

We have reviewed the draft amendments to the CZBL appended to Staff Report SRPBS.25.070 and note that the site specific provisions of the ZBLA have not been included in Section 19.0 Exceptions. Rather, the subject property is proposed to be classified within the *Neighbourhood Townhouse Two (NT2) Zone*.

While we appreciate that the Transition Regulations of Section 1.12 would apply, we note that **Regulation 1.12.8** would not transition the provisions of the ZBLA beyond building permit issuance, and that the Transition Regulations as a whole cease to be in force and effect 3 years after the CZBL is passed by the City.

This potentially creates situations in which the zoning for the site determined through a completed site specific process is simply no longer recognized and relief may be required despite compliance with those approvals. For example, if the further approvals take longer than anticipated, the proposed development could fall out of compliance with its current zoning approvals. Additionally, future Owners of the units within the proposed development may be restricted from otherwise ordinary alterations to their dwellings and need to seek significant relief from the provisions of the CZBL.

Accordingly, we ask that the ZBLA be included as a site-specific exception within **Section 19.0** of the CZBL. We also request that this exception be assessed against the proposed general regulations of the CZBL, with any additional relief incorporated into same to ensure that the proposed development remains fully compliant with the proposed regulations such that it is not necessary to rely on the Transition Regulations of **Section 1.12**.

We welcome the opportunity to meet with City Staff to discuss the above comments and concerns, and request to be notified of any further activity or reporting on this matter.

If you have any questions or require additional information, please do not hesitate to contact the undersigned at ext. 2101.

Yours truly,

GOLDBERG GROUP



Adam Layton, MCIP, RPP

cc. Country Wide Homes (Jefferson) Inc.